



ANTELOPE ACRES
TOWN COUNCIL
8812 West E-8
Antelope Acres, California 93536
September 8, 1999



Todd Thompson
Water Resources Control Board
Sacramento, CA 95844-3130

Dear Mr. Thompson:

The Draft EIR states that the G.O. Program objective is to provide flexible framework for brosolid land application based on sound science. This sound science tells you to exclude whole areas whose water will become contaminated. We fail to understand why only some areas will have their water quality threatened, but others apparently will not. There are so many restrictions on Class B applications that it would be dangerous for humans (workers) to enter the areas. Sound science indicates a reduction in agriculture; money will be made in accepting sludge, not in any ensuing crops. Your sound science notes there can be no assurances bacteria will not breed and migrate off site.

The residents of Antelope Acres, considering all the scientific evidence, reject land application of sludge. It is unconscionable for a government agency to allow certain sacrifice areas, putting citizens health at risk. Certainly sewage disposal is an important problem that need addressing. But there are better ways than land application that need to be studied as our thinking is hopefully moving toward the new millenium.

At least, the Antelope Valley must be added to the specific excluded areas. Excessive winds already bring in dust and air pollution; the relatively pristine aquifer provides our water. The Valley is targeted for massive home and estate growth.

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The Town Council did not receive a copy of the Draft EIR, though we were assured of receiving a copy. Therefore, we have behind on study and subsequent comments. We request that you please make sure that the Council is on your mailing list. Biosolids are a major issue in our community.

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In closing, I would like to reiterate that your own sound science dictates that you consider alternative recommendations to land application. We look forward to working with you on this issue.

10-8

Sincerely
Virginia M. Stout

Virginia M. Stout
Antelope Acres Town Council
661-9484359

Responses to Comments from the Antelope Acres Town Council

- 10-1. The draft EIR analyzed water quality impacts of implementing the proposed GO and recommended measures to mitigate significant impacts that could result from cumulative water quality impacts. Contrary to the commenter's opinion, the EIR did not determine that implementation of the proposed GO would result in water contamination. Additionally, exclusion areas were identified as places where the proposed GO did not apply. Land application may still occur in these locations but would be subject to individual waste discharge requirements. These exclusion areas were based on the Basin Plans for each of the RWQCB regions and existing state law.
- 10-2. The provisions of the proposed GO are sufficient to protect public health and the environment if the biosolids meet minimum quality requirements. The proposed mitigation measures identified in Chapter 5 (Measures 5-1 and 5-2) are intended to provide additional means of reducing grazing animals' risks of exposure to Class B biosolids. Human exposure is best controlled through the management practices related to storage, loading, spreading and incorporation into the soil, and posting of the areas to let people know that they need to practice good sanitation (hand washing, proper handling of dirty clothing and soil-laden shoes or boots in fields where material has recently been applied).
- 10-3. The commenter is expressing an opinion about the economic value of biosolids land application. No response is necessary.
- 10-4. The EPA Part 503 regulations addressed the issue of bacterial survival and regrowth. Bacteria and viruses can survive for a few days to several months depending on the environmental conditions (See Tables 5-1 and 5-2 of the draft EIR).

Regarding the regrowth of bacteria, it should be noted that the bacteria of concern are not spore formers so they are easily destroyed by adverse conditions found in the ambient environment. On the other hand, they are facultative (able to grow in the presence or absence of oxygen) and grow readily over a temperature range of about 10E to 40EC, if nutrients are available and competitors and predators are few. The ability to regrow is a particular disadvantage in instances where processing kills most predators and competitors. If nutrients are available when the stress (such as elevated temperature) is removed, very rapid bacteria regrowth can occur in the right conditions. These conditions are seldom found in the ambient environment.

Fecal indicators can still be used as conservative markers of bacteria regrowth. Because the initial densities of fecal indicators are much higher than pathogen densities, the fecal indicators survive adverse conditions better than pathogens do. Processing may eliminate pathogenic bacteria most of the time but nearly always leaves fecal indicators. These can regrow and indicate pathogenic bacteria when in fact none are present. Thus, fecal

indicators may be too conservative in some cases. When this situation is likely, a relatively hardy pathogenic bacterial species such as *Salmonella sp.* may be an indicator of pathogenic bacterial contamination. Yanko (1988) used a combination of these two approaches to assure product quality at a composting site. He set a coliform standard (19 MPN/g) before a compost batch could be released to a customer. If the compost could not be brought down to this level, the pile was tested for salmonellae and released if results were negative.

Overall, regrowth is not a concern and not a significant impact considering the site access restrictions, crop restrictions and buffer zones required by the proposed GO. No additional mitigation is needed under normal conditions found at land application sites.

- 10-5. This comment states that the residents of Antelope Valley are opposed to the land application of biosolids. The commenter's opinion regarding the citizen's being exposed to health risks is noted. The draft EIR indicates that citizens will not be exposed to significant health risks because of the precautionary measures that have been included in the proposed GO.
- 10-6. The exclusion areas designated in the proposed GO and identified on page 2-16 of the draft EIR are unique or valuable public resources, jurisdictional waters or preserves, or state-designated management areas. The exclusion areas were based on sensitive locations in each RWQCB's Basin Plan or in existing state law. The proposed GO contains specific requirements to protect the public from hazards related to movement of biosolids via air and water. Also see Response to Comment 10-1.
- 10-7. The Antelope Acres Town Council has been added to the distribution list.
- 10-8. Chapter 14 of the draft EIR identifies and evaluates several alternatives to the proposed GO, including the Land Application Ban Alternative. The environmental review process provides opportunities for members of the public to comment and to add or suggest revisions to alternatives before a decision is reached on the proposed project.